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BANKRUPTCY COUR Chapter 7

IN RE: Karen Jean Gagnon &

Michael Joseph Gagnon, Debtors

Case No. 13-12330-BAH

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## OBJECTION AND MOTION TO RELEASE UNCLAIMED FUNDS

**NOW COMES** Michael Joseph Gagnon and Karen Jean Gagnon, and files an objection to Edmond J. Ford, Trustee's affidavit that the \$5,000.00 in debtors' exemption was not attempted to be claimed.

- 1.) On August 11, 2015 check #111 in the amount of \$5,000.00, copy of which is attached at exhibit A, was presented for deposit and accepted as tendered in our new banking account with Workers Credit Union, see exhibit B for copy of August 11, 2015 deposit;
- 2.) The check was deposited within the ninety days of its face void date;
- 3.) On August 14, 2015, the deposit of \$5,000.00 was reversed due to premature stop payment issued on check #111, by Mr. Edmund J. Ford, Trustee, see exhibit C;
- 4.) This premature stop payment may result in bank fees and other expenses to correct this error by Mr. Edmund J. Ford, Trustee.

## WHEREFORE,

The debtors request that the \$5,000.00 be released and mailed to the debtors address on record with the court, as payment in full for the claimed homestead exemption;

And any and all fees and expenses related to this error are to be paid by Edmund J. Ford, Trustee, when presented for payment with detailed expense records, as Karen Jean Gagnon is on disability with limited income.

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Dated: August 17, 2015

Michael Joseph Gagnon

Dated: August 17, 2015

Karen Jean Gagnon

## **CERTIFICATION**

We, Michael Joseph Gagnon and Karen Jean Gagnon, debtors, certify that a copy of this Objection and Motion to Release Unclaimed Funds has been U.S. postal mailed to Attorney Edmund J. Ford, Trustee, on this day, Monday, August 17, 2015.

Dated: August 17, 2015

Karen Jean Gagnon

Dated: August 17, 2015

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7 90-3715 / 1222 \*\*\*\*\*\*\* AND A TRUE WATEHWARK HOLD ALAN ANGLETON VOID AFTER 90 DAYS Edmond J. Ford, Trustee 10 Pleasant Street. Suite 400 Portsmouth NH 03801-4551 Date 05/14/2015 Edmond J. Ford ттр #490090 ~~~Five Thousand Dollars and 00/100 Dividend paid 100,00% on \$5,000,00; Claim# EXEMPTI; Filed: \$5,000.00; GAGNON, MICHAEL JOSEPH GAGNON, KAREN JEAN Rabobank, N.A. Phone: 800-465-2415 for Rabobank Specialty Deposits Karen & Michael Gagnon 225 Brook Village Road Nashua NH 03062 Apartment 3 13-12330 BAH 9998069009 Reference; Pay to the Order of

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WCU - Groton Office Date: 08-11-2015 04:10:41 PM ACCT#: \*\*\*\*\*3638

Type: NA

Amount: \$5,000.00

Current Balance: \$5,000.00

Transaction Number: 2500 Cashbox Number: 238 Network Node: 2033

Find out how you can get more GiveBack today www.givebackcalculator.com

Deposits insured by NCUA/MSIC

Station: 53

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